

1 HONORABLE KYMBERLY K. EVANSON  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

10 BARBARA STROUGO, individually and on  
11 behalf of all others similarly situated,

Plaintiff,

v.

13 REALNETWORKS, INC., ROBERT  
14 GLASER, BRUCE A. JAFFE, CHRIS JONES,  
15 DAWN G. LEPORE, ERIK PRUSCH,  
MICHAEL B. SLADE, and TIM WAN,

Defendants.

16 NO. 2:24-cv-00297-KKE

**STIPULATION AND ORDER REGARDING  
SCHEDULING**

17 This stipulation is entered into by and between Lead Plaintiff Richard Brender ("Lead  
18 Plaintiff") and defendants RealNetworks, Inc., Robert Glaser, Bruce Jaffe, Chris Jones, Dawn Lepore,  
19 Erik Prusch, Michael Slade, and Tim Wan (collectively, "Defendants"), by and through their  
20 undersigned counsel.

21 WHEREAS, on March 4, 2024, former named plaintiff, Barbara Strougo, filed this action  
22 against Defendants, asserting claims under Sections 14(a) and 20(a) of the Securities Exchange Act of  
23 1934 (the "Exchange Act") and Rule 14a-9 promulgated thereunder;

24 WHEREAS, on May 3, 2024, Lead Plaintiff filed a motion for appointment as lead plaintiff  
25 and approval of lead counsel;

1 WHEREAS, on October 31, 2024, the Court entered an order appointing Lead Plaintiff as lead  
 2 plaintiff and his chosen counsel co-lead counsel in this Action;

3 WHEREAS, in its April 29, 2024 scheduling order (Dkt. 13), the Court gave the parties 14  
 4 days from entry of its lead plaintiff order to confer and jointly submit for the Court's approval a  
 5 proposed schedule for the filing of an amended class action complaint, along with a proposed briefing  
 6 schedule for Defendants' anticipated motion to dismiss;

7 WHEREAS, Lead Plaintiff and Defendants have conferred regarding the next steps in the  
 8 Action and agreed on the following schedule;

9 **NOW THEREFORE**, the Parties hereby stipulate and agree, subject to the Court's approval,  
 10 as follows:

- 12 1. Lead Plaintiff shall file his Class Action Complaint by December 31, 2024;
- 13 2. Defendants shall file an answer, motion to dismiss, or response thereto by  
 14 February 14, 2025;
- 15 3. If Defendants file a motion to dismiss as their response, Lead Plaintiff shall file any  
 16 opposition thereto by March 31, 2025; and
- 17 4. Defendants shall file any reply to Lead Plaintiff's opposition by May 14, 2025.

18 DATED: November 14, 2024

19 Respectfully Submitted,

20 **OF COUNSEL**

21 **BRESKIN JOHNSON TOWNSEND, PLLC**

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### *Counsel for Defendants*

STIPULATION AND ORDER  
REGARDING SCHEDULING - 3  
(Case No. 2:24-cv-00297-KKE)

## ORDER

The Court GRANTS the parties' stipulated motion. Dkt. No. 47. The Court ORDERS:

1. Lead Plaintiff shall file an amended Class Action Complaint by December 31, 2024;
2. Defendants shall file an answer, motion to dismiss, or response thereto by February 14, 2025;
3. If Defendants file a motion to dismiss as their response, Lead Plaintiff shall file any opposition thereto by March 31, 2025; and
4. Defendants shall file any reply to Lead Plaintiff's opposition by May 14, 2025.

Dated: November 15, 2024.

Kimberly A. Eason

Kymberly K. Evanson  
United States District Judge